

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**IN RE: LOCAL TV ADVERTISING  
ANTITRUST LITIGATION**

*This document applies to all actions.*

Master Docket No. 18-06785

MDL No. 2867

The Honorable Judge Virginia M. Kendall

**NOTICE OF MOTION FOR LEAVE TO FILE PLAINTIFFS' MOTION TO COMPEL  
DEFENDANT GRIFFIN COMMUNICATIONS LLC TO PRODUCE DOCUMENTS  
IDENTIFIED BY CERTAIN PROPOSED SEARCH TERMS UNDER SEAL**

PLEASE TAKE NOTICE that on Tuesday, September 21, 2021, at 9:00 a.m., the undersigned counsel will appear telephonically before the Honorable Virginia M. Kendall, or any judge sitting in her stead, and present their Motion for Leave to File Plaintiffs' Motion to Compel Defendant Griffin Communications LLC to Produce Documents Identified by Certain Proposed Search Terms Under Seal.

Dated: September 15, 2021

Respectfully submitted,

/s/ Robert J. Wozniak

**FREED KANNER LONDON &  
MILLEN LLC**

Robert J. Wozniak

Steven A. Kanner

2201 Waukegan Road, Suite 130

Bannockburn, IL 60015

(224) 632-4500

skanner@fklmlaw.com

rwozniak@fklmlaw.com

*Plaintiffs' Liaison Counsel*

**HAUSFELD LLP**

Megan E. Jones (admitted *pro hac vice*)  
600 Montgomery St. #3200  
San Francisco, CA 94111  
(415) 633-1908  
mjones@hausfeld.com

Hilary K. Scherrer (admitted *pro hac vice*)  
Nathaniel C. Giddings (admitted *pro hac vice*)  
888 16th Street, N.W., Suite 300  
Washington, DC 20006  
hscherrer@hausfeld.com  
ngiddings@hausfeld.com

*Plaintiffs' Lead Counsel*

**ROBINS KAPLAN LLP**

Meegan Hollywood (admitted *pro hac vice*)  
Matthew J. Geyer  
399 Park Avenue, Suite 3600  
New York, NY 10022  
(212) 980-740  
mhollywood@robinskaplan.com  
mgeyer@robinskaplan.com

*Plaintiffs' Steering Committee*

**FREED KANNER LONDON &  
MILLEN LLC**

Kimberly A. Justice  
923 Fayette Street  
Conshohocken, PA 19428  
(610) 234-6487  
kjustice@fklmlaw.com

*Plaintiffs' Steering Committee*

**BLEICHMAR FONTI & AULD LLP**

Lesley E. Weaver (admitted *pro hac vice*)  
Anne K. Davis (admitted *pro hac vice*)  
555 12<sup>th</sup> Street, Suite 1600  
Oakland, CA 94607  
(415) 445-4006  
lweaver@bfalaw.com  
adavis@bfalaw.com

*Additional Plaintiffs' Counsel*